



UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF SOLID AND HAZARDOUS WASTE

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HAZARDOUS WASTE GENERATOR EVALUATION FORM

| | |
|-------------------------|---|
| Facility Name: _____ | EPA ID Number _____ |
| Street Address: _____ | City: _____ Zip Code: _____ |
| County: _____ | Contact Person: _____ Phone Number: _____ |
| Generator Status: _____ | Number of Employees: _____ Date of Visit: _____ |
| Inspectors: _____ | |
| Other Personnel: _____ | |

| WASTE STREAM / GENERATION PROCESS | GENERATION RATE PER MONTH | HAZARDOUS WASTE CODE | PROPERLY MANAGED ? |
|---|------------------------------|-------------------------|-----------------------|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Total Quantity of Hazardous Waste Generated per Month: | | | |

RESPONSE NECESSARY: YES NO RESPONSE DUE BY: _____

COMMENTS: _____

This compliance evaluation notes areas where your hazardous waste management practices may not meet the regulatory requirements of the Utah Solid and Hazardous Waste Management Rules. If a "Response Due Date" is indicated, you must take the actions, summarized in this audit, in order to come into compliance and **NOTIFY THIS OFFICE IN WRITING** by the indicated date. Please be advised, that if we do not receive written documentation of these corrective actions by the response due date, you may be subject to further regulatory action, including administrative penalties. Please include your EPA number with your correspondence.

If you have further questions, or would like to discuss these issues with the inspectors or their supervisor, you may contact them during business hours at (801)538-6170. Items that must be submitted may be mailed to the address at the top of this page.

RECEIVED BY:

INSPECTOR:

Name, Printed:_____

Name, Printed_____

Signature:_____

Signature:_____

Title:_____

Title: Compliance Officer

Date:_____

Date:_____

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AND HAZARDOUS WASTE
SMALL QUANTITY GENERATOR
COMPLIANCE EVALUATION FORM

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Items that are marked "NO" on the line in the left-hand column are not in compliance with the Utah Solid and Hazardous Waste Regulations and require your immediate attention. Items marked "OK" meet the minimum requirements of the regulations. Items marked "NA" do not apply to your facility.

_____ 1. R315-5-2 DETERMINATION OF WHETHER A WASTE IS HAZARDOUS

ACTION NEEDED:_____

_____ 2. R315-3 NOTIFICATION AND EPA HAZARDOUS WASTE IDENTIFICATION NUMBERS:

- _____ a. If you generate between 100 and 1000 Kgs (220-2200 pounds) of hazardous waste per month or up to 1 Kg of **acutely hazardous** waste, you are classified as a **Small Quantity Generator** (SQG), and you must notify the Executive Secretary of the Utah Solid and Hazardous Waste Control Board and obtain an EPA ID number. This is accomplished by notifying the Utah Division of Solid and Hazardous Waste.
- _____ b. If you are a small quantity generator, you must obtain an EPA ID Number in order to offer hazardous waste for management to a transporter or to a treatment, storage and disposal facility (TSDF) that has an EPA ID Number.

ACTION NEEDED:_____

_____ 3. R315-5-4 MANIFESTS

- _____ a. Only use approved manifest form 8700-22 and 8700-22A when offering hazardous wastes for transport to a TSDF or use the manifest of the state that the TSDF is located in, if required by that state.
- _____ b. Designate another facility or instruct a transporter to return wastes if they are undeliverable.
- _____ c. Fill out all applicable sections of the manifest.
- _____ d. Use a contractual disposal agreement only if a generation rate is less than 1000 Kg/month (SQG or less).
- _____ e. Keep copies of contractual agreements for three years after service ends.

ACTION NEEDED:_____

_____ 4. R315-5-5 RECORD KEEPING

- _____ a. Keep copies of manifests for three years.
- _____ b. Keep all records, including determination of generation rates, waste characterization documentation, disposition, etc., for three years.

ACTION NEEDED:_____

_____ 5. R315-5-7 EXCEPTION REPORTING

- _____ a. If TSDF does not return generators' copy of manifest within 60 days, a generator must submit a letter stating so and a copy of the manifest to the Executive Secretary of the Utah Solid and Hazardous Waste Control Board.

ACTION NEEDED:_____

_____ 6. R315-5-9 PACKAGING, LABELING, MARKING AND PLACARDING

- _____ a. Package, Label and mark waste in accordance with DOT 49 CFR prior to shipment.

ACTION NEEDED:_____

_____ 7. R315-5-10 ACCUMULATION TIME

- _____ a. Do not store hazardous wastes for longer than 180 days, or 270 days if applicable, without a permit.
- _____ b. Do not exceed 6000 Kg of hazardous wastes stored at your facility at any time.
- _____ c. Mark the date the accumulation period began on each container of hazardous wastes. Satellite accumulation containers are the exception.

- _____ d. Label each tank and container with the words "HAZARDOUS WASTE" while it is being used to accumulate hazardous wastes.
- _____ e. Designate and authorize an emergency coordinator(s) who is(are) readily available by some means at all times.
- _____ f. Post the following information next to each telephone at the facility: Name and telephone number of the emergency coordinator(s) location(s) of fire extinguishers, spill control equipment and fire alarms, telephone number of the local fire department (or equivalent emergency response for facility).
- _____ g. Ensure that all employees are familiar with hazardous waste handling and emergency procedures.
- _____ h. The emergency coordinator must respond appropriately to emergencies that have the potential of involving hazardous waste(s).

ACTION NEEDED: _____

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- _____ **8. SPILL RESPONSE (THESE RULES ARE FOUND IN R315-9)**
- _____ a. Take appropriate action to minimize threats to human health and the environment by notifying the Utah State Department of Environmental Quality at **(801)536-4123 or 1-800-572-6400 (24 hour number)** if more than 1 Kg of acutely hazardous waste or 100 Kg of hazardous waste or material which when spilled becomes hazardous waste, is spilled as specified in 40 CFR 261.33(e). Notify the National Response Center when applicable and provide the appropriate information, listed in R315-9(c), in the spill report.

ACTION NEEDED: _____

- _____ **9. USE AND MANAGEMENT OF CONTAINERS (THESE RULES ARE FOUND IN 40 CFR 265 SUBPART I)**
- _____ a. Hold Hazardous Wastes in containers that are in good condition.
- _____ b. Store hazardous wastes in containers that are compatible with the waste.
- _____ c. Keep hazardous waste containers in a completely closed condition, except when adding or removing wastes.
- _____ d. Do not open, handle or store containers of hazardous waste in a manner which may cause a release.
- _____ e. Inspect containers of hazardous waste at least weekly to look for signs of leakage or deterioration. A log should be kept.
- _____ f. Do not store incompatible hazardous wastes in the same container.
- _____ g. Do not store hazardous wastes in containers that previously held an incompatible material without cleaning it first.
- _____ h. Separate incompatible hazardous wastes by means of a dike, berm or other method.

ACTION NEEDED: _____

- _____ **10. PREPAREDNESS AND PREVENTION (THESE RULES ARE FOUND IN 40 CFR 265 SUBPART C)**
- _____ a. You must operate your facility in such a manner that MINIMIZES the possibility of fire, explosion or any unplanned release.
- _____ b. You must have the following preparedness and prevention equipment unless the wastes' you stores do not pose the hazards that the equipment is designed to respond to: Internal communications or alarm capable of instruction, such as an intercom; A device capable of summoning outside emergency assistance (such as a direct alarm to the fire department or a telephone); portable fire extinguishers; water at adequate pressure and volume to supply fire fighting needs; Alarms and communication devices accessible to personnel where they are handling hazardous wastes.
- _____ c. You must maintain and test where necessary all communication systems; fire, spill response, decontamination and protective equipment.
- _____ d. You must maintain aisle space to allow unobstructed movement of personnel and emergency equipment
- _____ e. Make arrangements with local fire, police and hospitals to respond to emergency situations at your facility. Maintain documentation of notification letters, responses or lack of responses from these agencies.
- _____ f. Document refusals by authorities to emergency arrangements.

ACTION NEEDED: _____

- _____ **11. LAND DISPOSAL RESTRICTIONS (LDR) (THESE RULES ARE FOUND IN 40 CFR 268.7(a)(4))**
- _____ a. If you treat your hazardous wastes to render them non-Land Disposal Restricted, you must develop and follow a written waste analysis plan. This waste analysis plan must be based on a laboratory analysis of the waste, and must contain all necessary elements, including frequency. The waste analysis plan must be submitted to the Executive Secretary of the Utah Solid and Hazardous Waste Control Board at least 30 days prior to treatment.
- _____ b. Maintain an assessment of LDR status on file for each hazardous waste generated at the facility.
- _____ c. A notice and certification that each waste is, either not land disposal restricted, or if it is restricted, that it is land disposable after treatment, must accompany each manifested shipment of hazardous waste.
- _____ d. Maintain all LDR Documentation for five years after the waste is shipped off site.

ACTION NEEDED: _____

- _____ **12. R315-16 UNIVERSAL WASTES, FLUORESCENT LIGHT TUBES**
- _____ a. High mercury fluorescent light tubes must be recycled or disposed of hazardous waste. Any broken tubes must be managed as a hazardous waste, but can still be recycled. Do not dispose of tubes in the regular trash or in the dumpster.
- _____ b. Label either the waste tubes or container holding the tubes as "UNIVERSAL WASTE- MERCURY CONTAINING LAMPS".

ACTION NEEDED: _____

- _____ 13. R315-5-13 EXPORTS OF HAZARDOUS WASTE
- _____ 14. R315-5-14 IMPORTS OF HAZARDOUS WASTE
- _____ 15. USE AND MANAGEMENT OF TANK SYSTEMS (THESE RULES ARE FOUND IN 40 CFR 265.201 SUBPART J)
- _____ 16. OTHER ACTIONS NEEDED: _____

Examples

Employee Training Log (item #7g)

Date: February 2, 2001

Time: 10:00 am to 11:00 am

Discussion lead by: John Doe, Health and Safety Coordinator

Topics discussed:

I. Hazardous Waste Accumulation Time :

- a. Do not store hazardous wastes for longer than 180 days on site.
- b. Label each container or tank with the words "Hazardous Waste."

II. Use and Management of Containers:

a. Maintain a log weekly on the hazardous waste containers, are the containers closed, labeled, dated and in good condition. If not, please contact the emergency coordinator in order to rectify the problem.

III. Other topics as discussed:

- a.
- b.

Employee Name (Please Print)

Employee Signature

- 1.
- 2.
- 3.

Letters to Local Authorities (item #10e)

February 2, 2001

Letters to: Your Hospital
 Your local Police Department
 Your local Fire Department

Dear sir or Madame,

In accordance with 40 CFR 265 Subpart C, we are required to notify you that we generate hazardous waste(s). The waste(s) that we generate is (are)...examples might be; paint wastes, paint sludges, Methyl Ethyl Ketone, Acetone, other solvents, acids, bases, listed wastes, etc.

We make every effort to properly manage our waste, but in the event of an emergency we may require your assistance. In the event of an unforeseen emergency, you may be required to respond.

Your Name and Title
ABC Company

Examples

Emergency Coordinator and Emergency Information (item #7e and #7f)

*IN CASE OF EMERGENCY DIAL 911
*EMERGENCY COORDINATOR IS CARL CAREFUL-
EXT. 2536
*FIRE EXTINGUISHERS' LOCATION MARKED ON
WALL
*SPILL CONTROL EQUIPMENT LOCATED AT TIME
CLOCK

Universal Waste Labeling Requirements (item#12b)

**UNIVERSAL WASTE
MERCURY-CONTAINING
LAMPS**

date _____

[illegible]

MANIFEST MANAGEMENT LOG

[illegible]